

1 A No. It was just basically a combiner. All the
2 combiner does is hook the antenna to the TV set.

3 Q Okay. Well, I guess what I am trying to decipher then
4 is what difference the combiner would make or not make rela-
5 tive to the reception here?

6 A If the lady wanted to get 15 clearly, her TV needs to
7 be hooked up to something on Channel 15, some kind of an
8 antenna, whether it be a little piece of wire or something.
9 And then the way it was, the television just had two screws
10 sitting out there with nothing on it.

11 Q Okay. Am I understanding right that essentially then,
12 there was no antenna feed relative to Channel 15 on this TV?

13 A That is correct.

14 Q So she is picking up 15 over the air without the
15 benefit of the antenna?

16 A That is correct.

17 Q Okay. What was the purpose of changing the flat
18 antenna wire to a coax?

19 A Coax is a shielded wire. Flat lead tends to act to
20 some extent like an antenna. So going to coax gives you the
21 shielding from the antenna down to the TV set and also
22 improves directability of the antenna.

23 Q Okay. With respect to the snow, let me see if I can
24 find the specific sentence here. Okay. If you will turn to
25 page 11. If you go, one, two, three, four, five, six lines

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1 down, where it says, "The snow mentioned on Channels 6, 8 and
2 15 were not the product of FM blanketing interference." Do
3 you see that?

4 A Yes, sir.

5 Q Okay. Was the KOKS transmitter ever turned off in your
6 presence in order to determine whether any of the snow was in
7 fact due to KOKS?

8 A No, sir.

9 Q With respect to the rolling in the Channel 8 picture,
10 which appears in the next sentence, was the KOKS transmitter
11 ever turned off in your presence in order to determine whether
12 the rolling was due to KOKS?

13 A No, sir.

14 Q Now a little ways down in the paragraph, you mention a
15 spectrum analyzer. What is a spectrum analyzer supposed to
16 do?

17 A It looks at a band of frequencies and allows you to
18 pick out certain frequencies and stop them in time and see
19 what is there.

20 Q How expensive is a spectrum analyzer?

21 A The inexpensive ones for like band radio run around
22 \$10,000.

23 Q Now would that cover measuring of frequency such as
24 KOKS, or does that involve a different spectrum analyzer?

25 A The ones for business band won't look at the full

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1 spectrum.

2 Q Okay. Well, if you wanted to look at KOKS, what would
3 you have to get?

4 A You would have to have a spectrum analyzer, but you
5 would have to go to one much more expensive.

6 Q Okay. In other words, more than \$10,000?

7 A Right.

8 Q Do you have any idea how expensive it is to rent one?

9 A No, sir, I do not.

10 Q Now when you were at the Smith home, did the Stewarts
11 -- or prior to your going to the Smith home or while you were
12 at the Smith home there to do restoration work, were you ever
13 shown any of the complaints that the Smiths had filed with
14 either the FCC or sent to KOKS?

15 MR. DUNNE: Your Honor, I object to that. That has
16 been asked and answered about four or five times.

17 MR. SHOOK: I don't think in that particular form.

18 JUDGE STIRMER: Overruled. I don't recall that spe-
19 cific question being asked.

20 THE WITNESS: I don't recall specific complaints. Are
21 you talking like -- what are you asking exactly? Which docu-
22 ment?

23 BY MR. SHOOK:

24 Q Well, I can show you. If you would turn, let's see.
25 You don't have --

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1 JUDGE STIRMER: Well, let me ask you a general ques-
2 tion.

3 THE WITNESS: Yes, sir.

4 JUDGE STIRMER: Before you went out on any home
5 visit --

6 THE WITNESS: Yes, sir.

7 JUDGE STIRMER: -- did the Stewarts show you complaints
8 relating to the homes you were going to visit?

9 THE WITNESS: I saw petitions and letters, but as far
10 as in form that had been sent out and received back.

11 JUDGE STIRMER: But you don't remember seeing any of
12 the Smiths?

13 THE WITNESS: I remember seeing -- well, Ms. Smith sent
14 me derogatory letters.

15 JUDGE STIRMER: All right.

16 MR. SHOOK: Your Honor, I can focus attention specifi-
17 cally on one or more documents, and that will speed us up, I
18 hope. I am going to show Mr. Lampe some of the attachments to
19 Mass Media Bureau Exhibit No. 2. The particular document that
20 I am showing Mr. Lampe is page 16 of Mass Media Bureau Exhibit
21 2.

22 JUDGE STIRMER: Now what is your question?

23 MR. SHOOK: Whether Mr. -- no, let me try that again.

24 BY MR. SHOOK:

25 Q Mr. Lampe, have you seen this document before?

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1 A I don't recall having seen this exact document, but I
2 have seen these documents with names on the bottom. I really
3 didn't pay that much attention to whose name was at the bottom
4 of them when I saw them.

5 Q Okay. And what were the circumstances under which you
6 saw such documents?

7 A To be truthful, I don't remember exactly the cir-
8 cumstances. It may have been when I was just passing through
9 the office at the studio, or I don't think it was a specific
10 look at this type of situation.

11 Q Well, in other words, before you went to the Smiths'
12 home to do restoration work, for example, you weren't shown a
13 document such as Mass Media Bureau Exhibit 2, page 16, which
14 has circled, "TV channels affected," 6, 8, 12 and 15? And it
15 also has "Radio" circled. You weren't shown a document such
16 as that?

17 A Not to my recollection. I know that Ms. Stewart, she
18 took care of all of the paperwork. So basically I had the
19 filters in my caddy, and I was instructed as to where we were
20 going, and I went from there.

21 Q Thank you. Now with respect to your visit to the
22 Hillises' home, the second sentence reads, "Upon inspection I
23 found the antenna lead wire in her conductors was discolored."
24 And then the third sentence reads, "Clearly the Hillises had
25 experienced a lightning strike." Now what is the correlation

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1 | there between the discoloration you saw and the lightning
2 | striking?

3 | A Normally when an antenna experiences a lightning
4 | strike, it will -- it can do nothing to it if it is very
5 | light. If it is very heavy, it can literally blow the lead
6 | wire off the antenna and about the wave length of lightning,
7 | in so many places you will see it blown out the side, or you
8 | will see one conductor just blackened.

9 | Q And what is the significance of a blackened -- is that
10 | what you are talking about here when you say it was dis-
11 | colored, that it was blackened?

12 | A Yes, yes.

13 | Q Okay. And what is the significance of that with
14 | respect to television reception?

15 | A It impedes the flow of your signal to the wire.

16 | Q Okay. Are you telling us that the antenna connection
17 | doesn't work as well?

18 | A That is correct.

19 | Q Okay. And what kind of an effect -- you know, what is
20 | the severity of the extent of the effect?

21 | A You can have anything from very little reception to
22 | reception of certain channels not being there, to very little
23 | effect on a television, depending on the area you are at.

24 | Q Okay. Was there any way to tell from looking at this
25 | when the lightning strike occurred?

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1 A No, sir.

2 Q I take it that you looked at the antenna lead wire from
3 the back of the television on up to the antenna?

4 A Yes -- no. Do you mean stripped out the lead wire all
5 the way up to the antenna?

6 Q Well, when you say that the wire was discolored, what
7 were you looking at?

8 A You strip back a portion of the lead wire, and if you
9 strip it back 3 or 4 inches and it is black the length of
10 that, you can --

11 Q You can surmise that it was black all the rest of the
12 way?

13 A Black all the way up to the antenna, yes.

14 Q Okay. I mean, I just want to understand the basis for
15 what you are saying here. Now when it says that you tried the
16 89.5 trap filter on the flat lead wire from the antenna, is
17 this before you determined that it was discolored or after?

18 A I don't remember the exact sequence of events at that
19 house. I probably tried it before I changed the lead wire.

20 Q Okay. So you put the filter on first to see what
21 effect it would have and then you looked at the wire and saw
22 that the wire was discolored?

23 A Right.

24 Q Not the other way around?

25 A Right.

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1 Q Okay. So what, the order of these sentences should be
2 different then? Paragraph 17?

3 A That is correct.

4 Q Okay.

5 A Well, let me change that. I may have seen the type of
6 connector that was used, had a portion of the wire stripped,
7 and it is very possible that I saw the darkened lead wire
8 before I tried the trap and went ahead and tried the trap
9 before I changed the lead wire.

10 Q Okay.

11 A The sequence of events is not -- I don't recall them
12 exactly.

13 Q But this was with the understanding that there was some
14 problem with the antenna wire in the first place?

15 A Yes.

16 Q All right. Now when you changed the antenna wires to
17 coax, what exactly were you changing here? Apparently you
18 didn't change everything. There was something that was left?

19 A A small portion of flat lead wire was left. My recol-
20 lection is that Mr. Hillis did not want me to drill a hole in
21 his wall or notch his window because his window was very, very
22 expensive. So the only way of getting the lead wire into the
23 house was to open the window, put the lead through and shut
24 the window.

25 Q Okay. Is this the same lead wire that had the

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1 lightning damage?

2 A I don't recall whether I used new lightning, or new
3 lead wire, or a portion of his old lead wire. I really don't.

4 Q Okay. So we have a situation then where you have got
5 cable beginning with the antenna, going to the window?

6 A Yes.

7 Q Then when you are at the window, there is flat wire?

8 A Yes.

9 Q And what happens after you are inside the house? Are
10 we back to cable, or are we still using flat wire at this
11 point?

12 A If I recall correctly, once we changed to flat wire, we
13 left it flat wire. It was a very short section of flat wire.

14 Q Okay. And what you don't remember was whether this was
15 new flatware or what?

16 A That is correct. I do not remember.

17 Q Okay. Do you also remember what connections you made
18 between the flat wire and the coaxial cable?

19 A No, I don't.

20 Q Okay. Do you what a Balun is?

21 A Yes, I do.

22 Q And what is a Balun supposed to do?

23 A Change 300 ohm to 70 ohm impedance.

24 Q And that has an impact when you are talking about
25 connecting coaxial wire with flat lead, does it not?

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1 A Yes, sir, it does.

2 Q In other words, to make a proper connection or the best
3 connection, you would have used a Balun between the coaxial
4 cable and the flat lead wire?

5 A In some situations.

6 Q Okay. What situations would you not use a Balun?

7 A I have found at times in high RF situations, a Balun is
8 a transformer and can act as a demodulator in certain situa-
9 tions. And in certain situations it is better just to take
10 the impedance mismatch than put a transformer right there.

11 Q Now by a transformer, that would mean --

12 A A Balun.

13 Q Well, the Balun is connecting the coaxial and the flat
14 lead. Is the Balun going to act as some kind of device that
15 attracts or amplifies the undesired signal?

16 A It can.

17 Q Well, I mean, was that justification for perhaps not
18 using it?

19 A I don't remember whether I used one or not.

20 Q Okay. Should you have used one?

21 A I don't know. I am sure that I tried it both ways. I
22 don't know which way I left it.

23 Q Is there some way to shield the Balun so it doesn't act
24 as the transformer that you were talking about?

25 A I am sure there is.

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1 Q Do you happen to know how it might be done?

2 A I am not familiar with an exact shielded Balun per se.

3 I am sure that probably somebody makes one somewhere.

4 Q Now does it make any difference whether or not there
5 was a crimp in the antenna lead wire?

6 A Where it goes through the window?

7 Q Right.

8 A I would have to say through a wooden window it would be
9 minimal.

10 Q Okay. The Hillises had a wooden window?

11 A Yes.

12 Q So, in other words, the crimp really doesn't have any
13 effect at all?

14 A I would say minimal effect.

15 Q Okay. When you were speaking before about impedance
16 differences, what effect is that going to have on the signal,
17 the television signal that is received?

18 A You match impedances in order to get the best possible
19 signal-to-noise ratio.

20 Q Okay. By a mismatch, what is going to happen to the
21 television picture?

22 A You will have a certain amount of loss.

23 Q And how will that loss be reflected in what one sees?

24 A It will be -- it can be reflected as snow, or depending
25 on the length of the cable tied to the mismatch, the loss of

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1 certain frequencies or the attenuation of certain frequencies.

2 Q Was it brought to your attention when you were at the
3 Hillises that there was more than one television set that was
4 being affected by KOKS blanketing interference?

5 A At this time period?

6 Q Yes, sir, when you were there.

7 A I don't believe it was ever mentioned one way or the
8 other while I was in the presence of anybody.

9 Q Okay. So your answer to that question would be "no"?

10 A Right.

11 Q Okay. Were you aware that the Hillises had at least
12 one radio that was being affected by KOKS blanketing inter-
13 ference?

14 A I was aware that they had other problems.

15 Q Okay. Well, I am focusing specifically on radio at
16 that time?

17 A Specifically at that time, no, they didn't tell me
18 that.

19 Q Now you have some testimony here about the Hillises'
20 satellite, and there is a reference to a 70-megahertz IF
21 frequency. Now can you explain to me what, how do you know
22 that the satellite has a 70-megahertz IF frequency?

23 A Because it says on the back of the satellite receiver,
24 "70 megahertz IF."

25 Q Okay. Now why would the 70 megahertz IF frequency have

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1 anything to do with reception of Channel 12?

2 A Specifically, I haven't run numbers on that, but I do
3 know from past experience that if you turn off, you have a
4 horizontal interference line, and it seems to kind of roll in
5 front of the screen, and you unplug the satellite receiver,
6 that it will disappear.

7 Q Okay. Did any such experiment along those lines take
8 place at the Hillis house?

9 A To my recollection it did, yes.

10 Q And what happened when that occurred?

11 A Basically I was trying to show Mr. Hillis that his,
12 that the line that he was seeing on his Channel 12 was satel-
13 lite interference, so I unplugged the receiver and it disap-
14 peared.

15 Q Okay. Correct me if I am wrong, but with a satellite
16 and then an antenna system hooked up into the same TV, is
17 there normally some kind of switch that allows you to go from
18 one to the other? In other words, receiving on-air TV and
19 then receiving TV via the satellite?

20 A Normally, yes.

21 Q Okay. Do you recall whether such a -- it is like an
22 A/B switch? Or, you know, whatever name should be given to
23 it. You can give it a name.

24 A Yes. With the receiver that Mr. Hillis had, for him to
25 be able to switch from antenna to television, it would have

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1 had to have an A/B switch on it.

2 Q Okay. And what, if anything, did the Hillis TV have on
3 it, you know, in terms of --

4 A To my recollection, I don't remember if at the time I
5 was there, there was an A/B switch hooked to the set. I don't
6 recall. Maybe his TV was just hooked to the outside antenna
7 when I came there and everything else was disconnected. I
8 just really don't remember on that.

9 Q Well, I guess I am trying to understand how a TV is
10 hooked up to both --

11 A At the same time?

12 Q -- the antenna and the satellite at the same time?

13 A Sure. There are many ways to do it, but with
14 Mr. Hillis it would have been an A/B switch.

15 Q All right. If it is with an A/B switch and the switch
16 is flipped in such a way that he is supposed to be receiving
17 television from over the air, why would the presence of the
18 satellite have anything to do with how his television picture
19 looked?

20 A Certain, certain cabling arrangements radiate the
21 signals out of that satellite receiver even though they are
22 not hard-wired to the television.

23 Q And how does -- and one eliminates that by completely
24 unplugging?

25 A On Mr. Hillis's, because at that time, if memory

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1 serves, that is an Avcom receiver. There is no on/off switch
2 on it.

3 JUDGE STIRMER: Let me ask you this, Mr. Lampe.

4 THE WITNESS: Yes, sir.

5 JUDGE STIRMER: You went through all of this to deter-
6 mine the cause of the problem. Correct?

7 THE WITNESS: Yes, sir.

8 JUDGE STIRMER: Why didn't you ask KOKS to go off the
9 air for a minute or so to see if that was the reason for
10 Mr. Hillis's problem?

11 THE WITNESS: Do you mean the Channel 12 problem, sir?

12 JUDGE STIRMER: The problems that he was experiencing.
13 Didn't that occur to you?

14 THE WITNESS: No, sir, it did not occur to me.

15 JUDGE STIRMER: Well, if there was a complaint of
16 blanketing and that KOKS was causing the blanketing, wouldn't
17 a way to determine that be to observe the signal with KOKS on
18 the air and with KOKS off the air?

19 THE WITNESS: Yes, sir, that makes sense.

20 JUDGE STIRMER: It makes sense?

21 THE WITNESS: Yes, sir.

22 JUDGE STIRMER: But that never occurred to you?

23 THE WITNESS: It did not occur to me, no, sir.

24 JUDGE STIRMER: All right.

25 MR. SHOOK: Your Honor, you anticipated where I was

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1 going for some of these. I am going to have to --

2 JUDGE STIRMER: All right. Let's get to it, please.

3 (Off the record.)

4 (Back on the record.)

5 BY MR. SHOOK:

6 Q Mr. Lampe, when you were at the Hillis household and
7 you had the TV tuned to Channel 6 and Channel 6 came back on
8 again, now is the only programming that you saw and the only
9 programming that you heard from the Paducah, Kentucky, sta-
10 tion?

11 A I don't recall.

12 Q You don't recall whether the video and audio that you
13 observed was only from Paducah? It could have been from
14 Mountain View too? Is that what you are saying?

15 A Okay. According to my testimony, all I observed was
16 Channel 6 and that the resultant problems with 6 was not a
17 blanketing problem.

18 Q Okay. So your testimony is that what you saw on the
19 Hillis TV with respect to Channel 6 was not related to KOKS?

20 A Yes, sir.

21 Q You are saying that what you saw there was a weak
22 signal from what? Paducah?

23 A Yes, sir.

24 Q And co-channel from this Arkansas station?

25 A It's co-channel. I can't stipulate as to which

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1 channel, which station it was from.

2 Q Well, I am looking at your testimony, and the
3 second-to-the-last sentence reads that, "The snow and rolling
4 lines I observed were a result of weak signal and co-channel
5 interference from Channel 6 in Arkansas.

6 A That is what I surmised.

7 JUDGE STIRMER: Well, let me ask you this, Mr. Lampe.
8 Did you ask Mr. Hillis whether or not prior to KOKS going on
9 the air, whether or not he received Channel 6?

10 THE WITNESS: No, sir, I did not.

11 JUDGE STIRMER: Well, wouldn't that have been an
12 appropriate question to ask him to determine whether or not it
13 was KOKS that was having an impact on his reception?

14 THE WITNESS: It would have been, yes, sir.

15 JUDGE STIRMER: But that never occurred to you?

16 THE WITNESS: No, sir. Sir, can I --

17 JUDGE STIRMER: Do you want to amplify your answer?

18 THE WITNESS: It did occur to me, but there was very
19 little dialogue between Mr. Hillis and myself.

20 JUDGE STIRMER: All right, please.

21 MR. SHOOK: Okay.

22 BY MR. SHOOK:

23 Q A closing point with respect to the possibility of
24 co-channel interference. Do you even know what the Channel 6
25 Arkansas call sign is?

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1 A No, sir, I do not.

2 Q Moving on to paragraph 18.

3 MR. SHOOK: Your Honor, if I may, can I take one minute
4 here? Because I believe I asked some of these questions
5 already, and I don't want to cover the same ground.

6 JUDGE STIRMER: Off the record for a moment.

7 (Off the record.)

8 (Back on the record.)

9 JUDGE STIRMER: With respect to the problems with the
10 Hillises' home, you state in your testimony that the continu-
11 ing problems with the reception that you observed, so forth
12 and so forth, was not the result of interference from KOKS.
13 Correct? Do you see that? That is at the end of paragraph
14 17.

15 THE WITNESS: Yes, sir. At that, at that time.

16 JUDGE STIRMER: Okay. Now I want you to refer to
17 paragraph 18 with respect to Ms. Piper. And over on page 13
18 you say, "Channel 6 was receiving blanketing interference."
19 Do you see that?

20 THE WITNESS: Yes, sir.

21 JUDGE STIRMER: Now what I want to know is how you
22 determined that the Hillis's wasn't attributable to blanketing
23 but that Piper's was.

24 THE WITNESS: Ms. Piper had an antenna booster on her
25 antenna. Mr. Hillis did not.

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1 JUDGE STIRMER: So what does that mean?

2 THE WITNESS: The antenna amplifier was allowing the
3 signal in to block the FM and to block the Channel 6 of
4 Ms. Piper, although it did have an FM trap on it.

5 JUDGE STIRMER: All right.

6 BY MR. SHOOK:

7 Q Along those lines, was the amplifier and -- were the
8 amplifier and filter in the Piper system connected together?
9 Were they built in together, or did one precede the other?

10 A My recollection, if I recall, there were more than one.
11 One was built in the amplifier. We used a smaller distribu-
12 tion amplifier for her rather than an on-antenna amplifier,
13 trying to minimize the effect of FM blanketing. Specifically,
14 she wanted to watch Channel 23 out of the Cape, and she had a
15 very, very small antenna, and the lady did not want to any-
16 thing with her antenna. She wanted me to work with what she
17 had, and I did what I could within the bounds of what she had.

18 Q Okay. Was the KOKS signal getting into her system
19 before there was a filter? Or did it pass through the ampli-
20 fier and then hit the filter, or was it the other way around?

21 A Without the amplifier, with a trap, she had, she had no
22 KOKS problems. Without an amplifier she also didn't have an
23 Channel 23. So she wanted Channel 23, so I put the amplifier
24 on specifically for that purpose. And then she got the prob-
25 lems with Channel 6, and I tried to explain this to the lady

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1 | that that was what would happen. I made numerous trips to
2 | this lady's house, free.

3 | Q Excuse me?

4 | A Free. I did not charge her. I charged her the first
5 | time, and that was it. I lived at this lady's house for a
6 | couple of weeks and did not charge her a cent.

7 | Q Okay. When we were on lunch break, did you have a
8 | chance to consult any of your business records relative to
9 | your visits to the Piper household?

10 | A No, I did not.

11 | Q Okay. But I think you indicated this morning that you
12 | do have some?

13 | A Well, I'll have to go back to the attic and dig them
14 | out. Every year we pull our files and store them.

15 | Q Okay. How much of a problem is that?

16 | A It can be done. It is just a matter of some hours of
17 | looking.

18 | Q Okay. Well, I am not going to put you through that
19 | yet. Now it indicates in your testimony in paragraph 18, if
20 | you would take a look at the first sentence, that you were
21 | asked to come to her house in late July 1989. Now is that
22 | supposed to be your recollection of the first visit that you
23 | went to the Piper household?

24 | A Yes, sir.

25 | Q Okay. Now I believe I left with you the documents

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1 relative to Leatha Piper. Do you have them there?

2 A Yes, I have got them here.

3 Q Okay. Now if you go first to page 5 and then to
4 page 6. Page 6 was what we spent a lot of time looking at
5 this morning. Okay. First of all, do you see the date refer-
6 enced on the bottom of page 5?

7 A Yes.

8 Q June 7, 1989?

9 A Yes.

10 Q And then when you go to the next page where it says
11 "Over," and that is going to be page 6, and the reference is
12 there -- we went over this morning -- to your visits to that
13 household in May?

14 A Yes.

15 Q Okay. Now when you say in your testimony "July," is
16 that just, you know, misremembering on your part?

17 A That could be. In my testimony, I went back to my
18 sales slip of her television set. That is how I placed my
19 visit.

20 Q Okay. With respect to paragraph 18, the third sen-
21 tence, "If you get a marginal signal anyway hooking up a VCR
22 reduces the signal even more." Could you explain to us what
23 that is based on?

24 A You have a certain amount of insertion loss each time
25 you hook up or take off a signal. Unless you have a very,

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1 very good system, you may -- your loss will be minimal. But
2 through most VCRs that I have seen, if you have a snowy pic-
3 ture to begin with, if you take it through a VCR, it is going
4 to be more snowy.

5 Q Okay. So in essence, a VCR almost acts like a little
6 filter?

7 A Attenuator.

8 Q Attenuator? Okay. Now with respect to Ms. Piper, if
9 you could briefly look at the first four pages of her, of the
10 exhibit that has been identified as Mass Media No. 29.

11 A Yes, sir.

12 Q Okay. Were you aware of those documents before you
13 went to Ms. Piper's house?

14 A No, sir.

15 Q Now when you first went to Leatha Piper's house, do you
16 recall seeing any filter attached to the back of her tele-
17 vision?

18 A I believe there was a Radio Shack filter on the set.

19 Q Did you discuss with her how it got there?

20 A I don't recall.

21 Q What reception did you observe Leatha Piper to be
22 receiving when you first went to her house?

23 A She was receiving, this is if memory serves, because I
24 did not document any of this. Channel 12 was fair. Channel 6
25 was very snowy. Channel 15, I don't remember about

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1 Channel 15. And Channel 23 was just negligible.

2 Q Okay. Do you remember anything about Channel 8?

3 A No, I don't.

4 Q Was her reception of Channel 15 improved as a result of
5 your efforts that you made in 1989?

6 A I don't recall.

7 Q Did you ever determine what Leatha Piper's TV reception
8 was like with the KOKS transmitter turned off?

9 A No, sir, I did not.

10 Q Now I want to refer your attention to Mass Media Bureau
11 Exhibit No. 21. Okay. And if you would, please, turn to page
12 16. Do you see down at the bottom there, No. 65, the
13 reference to Leatha Piper?

14 A Yes, sir.

15 Q Okay. Why don't you read that paragraph to yourself?

16 A Okay.

17 Q Do you know how this information was derived?

18 A No, sir, I do not.

19 Q Do you know what two filters are being referenced
20 there?

21 A No, sir.

22 Q Do you know what booster is being referenced there?

23 A No, I -- not specifically, no.

24 Q I mean, that is the booster that you installed, isn't
25 it?

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1 A It could very well be.

2 Q And the second filter would have been a second, would
3 have a filter that you installed?

4 A It could be.

5 Q Moving on to paragraph 19, there is a reference in the
6 paragraph, the last sentence. It states, "In 1989, I believe
7 I visited the Ellis home at their request." Now why did you
8 visit the Ellis home?

9 A I do the repair work on their television sets.

10 Q This visit in 1989 was for the purpose of repairing
11 television reception or a television set?

12 A The television itself. And, you know, it is very
13 possible at that time that I was working on their satellite
14 system also, because their sons had gotten them a satellite
15 system for an anniversary present, and they were problems
16 getting it to operate. And I had to go out and track the
17 system and hook it up properly, and that may have been why I
18 was there. I have been at the Ellises numerous times.

19 Q All right. Well, I mean, it is noted here that you
20 were there in 1989, and I was wondering if you remembered, you
21 know, why you went there and what you did when you were there.

22 A I don't. I don't recall.

23 Q Okay. Were you aware that the Ellises had complained
24 to the Federal Communications Commission by complaints dated
25 January 28, 1989, and February 3, 1989?

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1 A Not at that time.

2 Q Did the Ellises ever tell you or call you after the
3 1991 visit that is referenced in paragraph 20 that they were
4 dissatisfied with their television reception?

5 A Yes.

6 Q And what did they tell you?

7 A That they were having, they had -- their reception was
8 terrible.

9 Q Well, did they go into any more detail than that?

10 A No. They just asked me to come out and make a service
11 call to see what I could do for them.

12 Q And did you do that?

13 A Yes, I did.

14 Q And what happened?

15 A The antenna booster that they had on their antenna was
16 faulty, and I unplugged the booster. The interference went
17 away. So I climbed up to the roof, bypassed the antenna
18 amplifier, and their reception was fair; and told them if, you
19 know, they wanted, we could put a new booster in to replace
20 the one that had failed and restore reception.

21 Q Okay. So there was a problem with the booster itself?

22 A Yes.

23 Q It got old and --

24 A It got water in it.

25 Q Okay. Now when you were at the Ellises -- were you

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